

EXHIBIT 18

From: McClammy, James I.
Sent: Tuesday, February 16, 2021 10:26 AM
To: 'donald@creadorelawfirm.com'; Knudson, Jacquelyn Swanner
Cc: Scott R. Bickford; Kent Harrison Robbins - KHR Law Offices; EXT RHoff@wiggin.com; Hayden.Coleman@dechert.com; Danielle.GentinStock@dechert.com; apreis@akingump.com; Townes, Esther C.; Oluwole, Chautney M.
Subject: RE: Re: 19-CV-23649 REQUEST FOR MEET AND CONFER RE: CENTRAL REPOSITORY FRIENDLY REMINDER

Adding Wiggin, Dechert and Akin.

Don –

The Bates number that you sent was helpful. The referenced Vol. 105, VIII has been produced a number of times (more than 40, I am told). Here are some of the bates numbers were you will be able to find this:

PPLPC002000179852
PPLPC005000119793
PPLPC016000222709
PPLPC018000202388
PPLPC019000242243
PPLPC020000231378
PPLPC051000072471
PPLPC056000063938
PURCHI-000572404
PDD1701067475
PKY183283157
PPLP004497156.

We can discuss this further on our call, but we have not found anything to suggest that there is some repository or database containing materials that would not otherwise have been subject to review and production for the information you are seeking.

J.I.M.

From: donald@creadorelawfirm.com <donald@creadorelawfirm.com>
Sent: Tuesday, February 16, 2021 7:17 AM
To: McClammy, James I. <james.mcclammy@davispolk.com>; Knudson, Jacquelyn Swanner <jacquelyn.swanner@davispolk.com>
Cc: don creadore <Donald@creadorelawfirm.com>; Scott R. Bickford <srb@mbfirm.com>; Kent Harrison Robbins - KHR Law Offices <KHR@khrlawoffices.com>
Subject: FW: Re: 19-CV-23649 REQUEST FOR MEET AND CONFER RE: CENTRAL REPOSITORY FRIENDLY REMINDER

Good Morning Jacquelyn, Jim-
Continuing our dialogue regarding Central Repository-

Two days ago, we sent you the bates code, below, and wanted you to confirm that Debtors have located it. Kindly advise in advance of today's call.

Many thanks,

Don

o/b/o Purdue NAS Children Ad Hoc

Donald E. Creadore

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450 Seventh Avenue - Suite 1408

New York, New York 10123

(O) 212.355.7200

(C) 917.226.1881

donald@creadorelawfirm.com

-----Original Message-----

From: "donald@creadorelawfirm.com" <donald@creadorelawfirm.com>

Sent: Saturday, February 13, 2021 8:29am

To: "McClammy, James I." <james.mcclammy@davispolk.com>

Cc: "Knudson, Jacquelyn Swanner" <jacquelyn.swanner@davispolk.com>, "Scott R. Bickford"

<srb@mbfirm.com>, "Kent Robbins" <khrobbins@kentharrisonrobbins.com>, "Robert Hoff"

<rhoff@wiggin.com>, "don creadore" <Donald@creadorelawfirm.com>

Subject: Re: 19-CV-23649 REQUEST FOR MEET AND CONFER RE: CENTRAL REPOSITORY

Good morning Jim-

Two important clarifications.

1.

the Central Repository, Stamford CT., is *not* the same facility Debtors are proposing in their statements regarding the creation of a document repository to function post-bankruptcy. If my understanding is incorrect please clarify.

2.

I have located the proper source data for the document containing the reference to the Central Repository, Stamford, CT; it bears an IACS coding.

The following data should suffice.

- IACS_0000008375 @ 0000008404.

[please remind me not to refer to document provenance by memory on a phone call; please ignore kiteworks and also no need to bother E&Y.]

I hope this spares you some effort.

Please call me to discuss.

Many thanks,

Don

-----Original Message-----

From: "McClammy, James I." <james.mcclammy@davispolk.com>

Sent: Friday, February 12, 2021 1:47pm

To: "donald@creadorelawfirm.com" <donald@creadorelawfirm.com>

Cc: "Knudson, Jacquelyn Swanner" <jacquelyn.swanner@davispolk.com>, "Scott R. Bickford"

<srb@mbfirm.com>, "Kent Robbins" <khrobbins@kentharrisonrobbins.com>, "Robert Hoff"
<RHoff@wiggin.com>

Subject: Re: 19-CV-23649 REQUEST FOR MEET AND CONFER RE: CENTRAL REPOSITORY

Don —

Thanks for the call. As discussed, the repository you refer to in your email today and that was announced by the debtors is not something already in existence, but is to be made available post-bankruptcy. With respect to the entry you cited ("Central Repository Stamford, CT: Vol 105, VIII. Clinical Data: Integrated Summary of Safety: June 2002 Periodic Safety Update Report Oxycodone Hydrochloride Preparations; 13-Oct-01 through 12-April-02.") it would be helpful if you could provide us the Bates Number for the document you pulled that information from and let us know the producing party so that we can follow up again. I note you did also say that this may have come from Kiteworks and may have been something tied to Ernst & Young. We will take that additional information as well and see if that helps us figure out what this may be referring to.

J.I.M.

Sent from my iPad

On Feb 12, 2021, at 1:22 PM, McClammy, James I.
<james.mcclammy@davispolk.com> wrote:

Adding Wiggin and Dechert to this chain.

Don —

I am still not sure what you are referring to with respect to the Central Repository described as being introduced triumphantly in the Fall of 2020 by the debtors. Are you referring to the fact that Debtors have stated that parties will have access to documents once the bankruptcy is over? There may be some disconnect, but I am not following how that relates to the entry you quoted in your earlier email (nor have we been able to determine where that entry you quoted is from).

I have a short window now and will give you a call to see if there is additional information to help us so we can try to get answers before we speak.

J.I.M.

On Feb 12, 2021, at 1:02 PM, donald@creadorelawfirm.com wrote:

Jacquelyn, Jim,

Purdue Adverse Event Database

Thanks for the report on the adverse event database results. Given the lack of success, before going further with the adverse event database, should we not specify and employ the other databases that, according to Debtors, are capable of furnishing yielding meaningful patient data? We inquired previously and renew our request for information and a meaningful response from Debtors on this subject.

Purdue Central Repository

The Central Repository, as you know, was introduced triumphantly by Debtors as a public benefit, in Fall 2020. So, it comes as some surprise that our questions

have yielded no meaningful responses and, instead, an offer to discuss our particular questions. Our preliminary questions are routine and, seemingly, simple to answer:

What is the address(es) of the Central Repository and who are its custodians?

Does the Central Repository maintain, among other materials, pre-clinical, clinical, GLP and non-GLP information regarding opioids, Oxycodone, Oxycodone Hydrochloride preparations, or genotoxic data and genotoxicity databases? If yes, is there a directory, registry, an index, or similar document listing the contents of the Central Repository? If yes, please furnish a copy of the index, or directory (or similar), or portions relevant to our requests.

By virtue of the fact that the IACs have shared their "understanding that this facility was/is owned and operated by Purdue or one of its affiliates.[and] As a result, DPW/Purdue would be the proper parties to contact regarding any questions you may have about this facility", a prompt response it reasonable and expected and, most certainly, in advance of the next Omnibus hearing.

Meet and Confer

For avoidance of doubt, we are available to meet and confer to discuss over the weekend and on President's Day, albeit we are unsure of your availability. We confirm your counter-proposal of pushing back the meet and confer to Tuesday, February 16, 2021, at 1p est (noon cst.), unless an earlier time can be set.

Many thanks,
Don

o/b/o Purdue NAS Children Ad Hoc

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-----Original Message-----

From: "Knudson, Jacquelyn Swanner" <jacquelyn.swanner@davispolk.com>

Sent: Friday, February 12, 2021 8:11am

To: "donald@creadorelawfirm.com" <donald@creadorelawfirm.com>

Cc: "McClammy, James I." <james.mcclammy@davispolk.com>, "Scott R. Bickford" <srb@mbfirm.com>, "Kent Robbins" <khrobbins@kentharrisonrobbins.com>

<khrobbins@kentharrisonrobbins.com>

Subject: RE: RE:19-CV-23649 REQUEST FOR MEET AND CONFER RE: CENTRAL REPOSITORY

Don,

Following up on your prior request for birth mother information. We ran 30 birth mother names through Purdue's adverse event (AE) database and got 0 hits. We understand that this is only a sample of the thousands of birth mother names we received from Prime Clerk, and there is a chance that a birth mother name for one of your other clients might be in the AE database. Before we undertake the effort of searching the database for additional names, however, we want to be sure that any information we find can be disclosed. As discussed, the AE database contains personally identifying information and protected health information, so we need to make sure we have HIPAA releases from those individuals. We want to be sure that before we undertake the expense and effort of this exercise that the information can, in fact, be shared with you.

As to your second request regarding the Central Repository, we think it would be helpful to discuss your particular questions. Unfortunately, Friday, February 12 at 2 p.m. does not work for us. We are available Tuesday, February 16, 1-3 p.m. or 4-5 p.m., or Wednesday, February 17, Noon-3:30 p.m. Please let us know if one of those times work for you, and we will put something on the calendar.

Best,
Jacquelyn

Jacquelyn Swanner Knudson

Davis Polk & Wardwell LLP

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jacquelyn.swanner@davispolk.com

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From: donald@creadorelawfirm.com <donald@creadorelawfirm.com>
Sent: Thursday, February 11, 2021 6:18 PM
To: Knudson, Jacquelyn Swanner <jacquelyn.swanner@davispolk.com>
Cc: McClammy, James I. <james.mcclammy@davispolk.com>; Scott R. Bickford <srb@mbfirm.com>; Kent Robbins <khrobbins@kentharrisonrobbins.com>
Subject: RE:19-CV-23649 REQUEST FOR MEET AND CONFER RE: CENTRAL REPOSITORY

Jacquelyn, Jim-
Friendly reminder. We are available.
Kindly respond.
Many thanks,
Don

-----Original Message-----

From: "Knudson, Jacquelyn Swanner" <jacquelyn.swanner@davispolk.com>
Sent: Wednesday, February 10, 2021 1:01pm
To: "donald@creadorelawfirm.com" <donald@creadorelawfirm.com>,
"McClammy, James I." <james.mcclammy@davispolk.com>
Cc: "Scott R. Bickford" <srb@mbfirm.com>, "Kent Robbins"

<khrobbins@kentharrisonrobbins.com>

Subject: RE: CONFIDENTIAL 19-CV-23649 REQUEST FOR MEET AND
CONFER RE: CENTRAL REPOSITORY

Don,

We are following up on your inquiry and coordinating schedules with co-counsel
(Dechert and Wiggin) for the meet and confer. We will revert as soon as possible.

Best,
Jacquelyn

Jacquelyn Swanner Knudson

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From: donald@creadorelawfirm.com <donald@creadorelawfirm.com>

Sent: Wednesday, February 10, 2021 12:27 PM

To: McClammy, James I. <james.mcclammy@davispolk.com>; Knudson, Jacquelyn
Swanner <jacquelyn.swanner@davispolk.com>

Cc: don creadore <Donald@creadorelawfirm.com>; Scott R. Bickford
<srb@mbfirm.com>; Kent Robbins <khrobbins@kentharrisonrobbins.com>

Subject: CONFIDENTIAL 19-CV-23649 REQUEST FOR MEET AND CONFER RE: CENTRAL
REPOSITORY

Hello Jacquelyn, Jim,

We are in need of details from the Debtors regarding the Central Repository
Stamford, CT.

(As, for example, in the following entry:

Central Repository Stamford, CT: Vol 105, VIII. Clinical Data: Integrated
Summary of Safety: June 2002 Periodic Safety Update Report Oxycodone
Hydrochloride Preparations; 13-Oct-01 through 12-April-02.)

Does the Central Repository maintain, among other materials, pre-clinical,
clinical, GLP and non-GLP information regarding opioids, Oxycodone,
Oxycodone Hydrochloride preparations, or genotoxic data and genotoxicity
databases? If yes, is there a directory, registry, an index, or similar document
listing the contents of the Central Repository? If yes, please furnish a copy of the
index, or directory (or similar), or portions relevant to our requests for--only by
way of example-- non-GLP, GLP, pre-clinical and clinical toxicology animal
studies; genotoxicity databases; chromosomal aberrations, in addition to the
express request above (underlined).

The foregoing questions were presented to the IACs and, in response, it was
explained, in sum and substance, that the IACs are unable to share any knowledge
or assistance.

We are proposing a meet and confer for Friday, February 12, 2021, @ 2p est;
kindly advise of your availability.

Don

o/b/o Purdue NAS Children Ad Hoc

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